



January 3, 2005

VIA OVERNIGHT DELIVERY

The Honorable Kent A. Jordan
United States District Judge
United States District Court
for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street, Room 6325
Lockbox 10
Wilmington, Delaware 19801

Re: *A.B. Dick Co., et al. v. MHR Capital Partners, L.P., et al., Civil Action No. 05-116-KAJ*

Dear Judge Jordan:

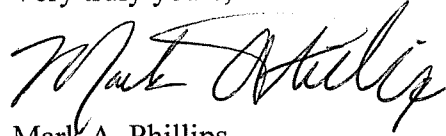
As counsel to the parties in the above-captioned civil action (the "Action"), we are in receipt of your correspondence dated December 29, 2005, regarding the need for a scheduling conference in connection with the Action. We are pleased to report that the parties have reached an agreement that, subject to the bankruptcy court's approval of the agreement and confirmation of a contemplated plan of reorganization, will result in dismissal of the Action as well as the related case, Civil Action No. 05-115, pending before you.

In light of this agreement and in an effort to preserve the assets of the plaintiffs' bankruptcy estates, we jointly request that the noticed scheduling conference be postponed to a date after February 1, 2006, consistent with the Court's calendar. Prior to such date, the parties will inform the Court if the agreement has been approved by the bankruptcy court; in the event the agreement is approved, the parties will move the Court to stay the Action pending the confirmation and effectiveness of the contemplated plan of reorganization. The parties presently anticipate that the contemplated plan would be effective no later than April 30, 2006.

We will contact your secretary within the next several days to ascertain whether the requested postponement is acceptable and to schedule a conference date. We greatly appreciate the Court's patience and understanding as the parties seek to conclude this matter without the need for further proceedings.

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Very truly yours,



Mark A. Phillips
Counsel for Plaintiffs



Michael M. Fay
Counsel for Defendants

cc: James C. Carignan
Richard S. Cobb
Raymond H. Lemisch
Frederick B. Rosner
David B. Stratton
Philip Trainer, Jr.
Jeffrey C. Wisler



Frederick B. Rosner (#3995)
Delaware Counsel for Plaintiffs